

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:20-CR-228
	:	
	:	
Plaintiff,	:	JUDGE BENITA Y. PEARSON
	:	
-vs-	:	
	:	
WAYNE NORRIS,	:	<u>DEFENDANT'S SECOND SUPPLEMENT</u>
	:	<u>TO MOTION FOR RELEASE ON BOND</u>
Defendant.	:	

Defendant, through counsel, submits this second supplement his Motion for Release on Bond and Supplement to Motion for Release on Bond (filed under seal) (ECF # 23 and 24, Motion for Release on Bond and Sealed Supplement to Defendant's Motion for Release on Bond). Mr. Norris requests that he be released on unsecured bond with conditions of house arrest and location monitoring pursuant to 18 U.S.C. § 3142(b), (f)(2)(B), or (i) with additional information relevant to this Court's decision. Since the filing of his Motion for Release on Bond, Mr. Norris's health has continued to deteriorate. In addition to the previously noted symptoms related to his medical condition (ECF # 24), Mr. Norris is now exhibiting symptoms that may be consistent with worsening of his previously diagnosed medical condition (ECF # 24) or consistent with COVID-19 (or both). He has lost his sense of smell. He has lost his sense of taste. His nose has been burning for 5 days. He has had a headache for 5 days. His whole body is sore and aches. He has extreme pressure behind his eyes. His throat is sore. His has a fever of 100 degrees. These symptoms are

consistent with COVID-19.¹ He has repeatedly reported these symptoms. His requests for COVID-19 testing has been refused.

The situation is expected to worsen. There are multiple people in his block with same symptoms. Two people have been taken out and quarantined. His cell block is now on locked down.

If his Motion for Release on Bond is granted, not only will he be able to isolate and engage in the self-protective behavior universally recommended during this pandemic, but he will be able to use his health insurance to get testing and desperately needed health care. To date, the only health care provided by the medical staff at NEOCC has been ibuprofen and nasal spray.

For these additional reasons, Mr. Norris respectfully renews his previously filed Motion for Release on Bond.

Respectfully submitted,

STEPHEN C. NEWMAN
Federal Public Defender
Ohio Bar No. 0051928

/s/Darin Thompson
DARIN THOMPSON
Assistant Federal Public Defender
Ohio Bar: 0067093
Office of the Federal Public Defender
1660 West Second Street, Suite 750
Cleveland, OH 44113
(216)522-4856 Fax:(216)522-4321
E-mail: darin_thompson@fd.org

¹ <https://www.cdc.gov/coronavirus/2019-ncov/symptoms-testing/symptoms.html>